UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GORDON CAPLAN

1:19-mj-06087-MPK-7

DEFENDANT GORDON CAPLAN'S MOTION TO CONTINUE

Defendant Gordon Caplan respectfully requests that the Court continue the date for his initial appearance until either April 3, 2019 or April 5, 2019. As grounds for his Motion, Mr. Caplan states that his counsel, Michael G. McGovern, will be traveling out of state on March 29, 2019, which is the current date set for Mr. Caplan's initial appearance. Counsel for the defendant propose either April 3, 2019 or April 5, 2019, when all could be present.

Counsel for the government has informed defense counsel that the government takes no position on this Motion.

Dated: March 21, 2019

Respectfully submitted,

By: /s/ Joshua S. Levy

Joshua S. Levy (BBO #563017)
Christopher J. Walsh (BBO #685252)
Ropes & Gray LLP
800 Boylston Street
Boston, MA 02199-3600
Tel: (617) 951-7000
joshua.levy@ropesgray.com
christopher.walsh@ropesgray.com

Michael G. McGovern (admitted *pro hac vice*) Ropes & Gray LLP 1211 Avenue of the Americas New York, NY 10036 Tel: (212) 841-8860 michael.mcgovern@ropesgray.com

Patrick J. Smith (admitted pro hac vice)
Sarah Zimmer (admitted pro hac vice)
Smith Villazor LLP
1700 Broadway, Suite 2801
New York, NY 10019
Tel: (212) 582-4400
patrick.smith@smithvillazor.com
sarah.zimmer@smithvillazor.com

Attorneys for Defendant Gordon Caplan Case 1:19-mj-06087-MPK Document 123 Filed 03/21/19 Page 3 of 3

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the ECF system will be sent

electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)

on March 21, 2019.

By: /s/ Joshua S. Levy

3